

Harvey R. Miller  
Stephen Karotkin  
Joseph H. Smolinsky  
WEIL, GOTSHAL & MANGES LLP  
767 Fifth Avenue  
New York, New York 10153  
Telephone: (212) 310-8000  
Facsimile: (212) 310-8007

Attorneys for Debtors  
and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X  
:  
**In re** : **Chapter 11 Case No.**  
:  
**MOTORS LIQUIDATION COMPANY, et al.,** : **09-50026 (REG)**  
**f/k/a General Motors Corp., et al.** :  
:  
**Debtors.** : **(Jointly Administered)**  
:  
-----X

**NOTICE OF ADDITIONAL PRIOR ORDERS TO BE DEEMED APPLICABLE  
TO REMEDIATION AND LIABILITY MANAGEMENT COMPANY, INC.  
AND ENVIRONMENTAL CORPORATE REMEDIATION COMPANY, INC.**

PLEASE TAKE NOTICE that on October 16, 2009 the Court entered an order (the “**REALM/ENCORE Order**”) [Docket No. 4255] directing certain orders theretofore entered in the chapter 11 cases of Motors Liquidation Company (f/k/a General Motors Corporation) and certain of its affiliated debtors, as debtors in possession (collectively, the “**Initial Debtors**”)<sup>1</sup> be made applicable to Remediation and Liability Management Company, Inc. (“**REALM**”) and Environmental Corporate Remediation

---

<sup>1</sup> The Initial Debtors in these chapter 11 cases are as follows: Motors Liquidation Company (f/k/a General Motors Corporation); MLCS, LLC (f/k/a Saturn, LLC); MLCS Distribution Corporation (f/k/a Saturn Distribution Corporation); and MLC of Harlem, Inc. (f/k/a Chevrolet-Saturn of Harlem, Inc.).

Company, Inc. (“**ENCORE**”) (collectively, the “**REALM/ENCORE Debtors**” and collectively with the Initial Debtors, the “**Debtors**”) effective *nunc pro tunc* to October 9, 2009 (the “**REALM/ENCORE Commencement Date**”).

PLEASE TAKE FURTHER NOTICE that the REALM/ENCORE Order further provides that to the extent the REALM/ENCORE Debtors identify any additional prior orders entered in the chapter 11 cases of the Initial Debtors that should also be made applicable to the REALM/ENCORE Debtors, such additional prior orders shall be made applicable to the REALM/ENCORE Debtors upon filing a notice.

PLEASE TAKE FURTHER NOTICE that the Debtors have deemed that the following additional prior orders (the “**Additional Prior Orders**”) should be deemed applicable to REALM and ENCORE:

<b>Date</b>	<b>Docket Number</b>	<b>Order</b>
9/29/2009	4126	Order Pursuant to 11 U.S.C. §§ 363 and 105(a) for Authority to Reimburse Former Directors of General Motors Corporation (related Doc # 4058)
10/6/2009	4180	Order Authorizing the Debtors to (I) File Omnibus Claims Objections and (II) Establish Procedures for Settling Certain Claims (Related Doc # 4108)

PLEASE TAKE FURTHER NOTICE that in accordance with the REALM/ENCORE Order, the Additional Prior Orders will be deemed applicable to the REALM/ENCORE Debtors absent an objection within ten (10) calendar days of the filing of this Notice.

PLEASE TAKE FURTHER NOTICE that any responses or objections to this Notice must be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court, and shall be filed with the

Bankruptcy Court (a) electronically in accordance with General Order M-242 (which can be found at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov)) by registered users of the Bankruptcy Court's filing system, and (b) by all other parties in interest, on a 3.5 inch disk, preferably in Portable Document Format (PDF), WordPerfect, or any other Windows-based word processing format (with a hard copy delivered directly to Chambers), in accordance with General Order M-182 (which can be found at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov)), and served in accordance with General Order M-242, and on (i) Weil, Gotshal & Manges LLP, attorneys for the Debtors, 767 Fifth Avenue, New York, New York 10153 (Attn: Harvey R. Miller, Esq., Stephen Karotkin, Esq., and Joseph H. Smolinsky, Esq.); (ii) the Debtors, c/o Motors Liquidation Company, 500 Renaissance Center, Suite 1400, Detroit, Michigan 48243 (Attn: Ted Stenger); (iii) General Motors, LLC, 300 Renaissance Center, Detroit, Michigan 48265 (Attn: Lawrence S. Buonomo, Esq.); (iv) Cadwalader, Wickersham & Taft LLP, attorneys for the United States Department of the Treasury, One World Financial Center, New York, New York 10281 (Attn: John J. Rapisardi, Esq.); (v) the United States Department of the Treasury, 1500 Pennsylvania Avenue NW, Room 2312, Washington, DC 20220 (Attn: Joseph Samarias, Esq.); (vi) Vedder Price, P.C., attorneys for Export Development Canada, 1633 Broadway, 47th Floor, New York, New York 10019 (Attn: Michael J. Edelman, Esq. and Michael L. Schein, Esq.); (vii) Kramer Levin Naftalis & Frankel LLP, attorneys for the statutory committee of unsecured creditors, 1177 Avenue of the Americas, New York, New York 10036 (Attn: Thomas Moers Mayer, Esq., Amy Caton, Esq., Adam C. Rogoff, Esq., and Gregory G. Plotko, Esq.); (xii) the Office of the United States Trustee for the Southern District of New York, 33 Whitehall Street, 21st Floor, New York, New York 10004 (Attn: Diana G. Adams, Esq.);

and (xiii) the U.S. Attorney's Office, S.D.N.Y., 86 Chambers Street, Third Floor, New York, New York 10007 (Attn: David S. Jones, Esq. and Matthew L. Schwartz, Esq.), so as to be received no later than **January 29, 2010, at 4:00 p.m. (Eastern Time)**.

PLEASE TAKE FURTHER NOTICE that if no objections are timely filed and served with respect to this Notice, (i) the Additional Prior Orders shall be deemed applicable to the REALM/ENCORE Debtors effective *nunc pro tunc* to the REALM/ENCORE Debtors Commencement Date and (ii) Exhibit "A" to the REALM/ENCORE Order shall be deemed amended to include the Additional Prior Orders, as set forth in the amended Exhibit "A" annexed hereto.

PLEASE TAKE FURTHER NOTICE that Exhibit "A" to the Cash Management Order [Docket No. 2542] (as defined in the amended Exhibit "A" annexed hereto) is hereby amended to include the bank accounts of the REALM/ENCORE Debtors, which are listed in Exhibit "B" annexed hereto.

Dated: New York, New York  
January 19, 2010

/s/ Stephen Karotkin

Harvey R. Miller  
Stephen Karotkin  
Joseph H. Smolinsky

WEIL, GOTSHAL & MANGES LLP  
767 Fifth Avenue  
New York, New York 10153  
Telephone: (212) 310-8000  
Facsimile: (212) 310-8007

Attorneys for Debtors  
and Debtors in Possession

**Amended Exhibit A**

**Additional Prior Orders Entered  
in Motors Liquidation Company, et al., f/k/a  
General Motors Corp., et al., Case No. 09-50026 (REG)**

<u>Date</u>	<u>Docket Number</u>	<u>Order</u>
6/1/2009	156	Order Granting Motion for Joint Administration (Related Doc # 16 )
6/1/2009	157	Case Management Order #1
6/1/2009	158	Order Granting Motion of Debtors for Entry of Order Pursuant to 11 U.S.C. Sections 105 (a), 342(a), and 521(a)(1), Fed. R. Bankr. P. 1007(a) and 2002(a), (d), (f) and (l), and Local Bankruptcy Rule 1007-1 (I) Waiving Requirement to File Lists of Creditors and Equity Security Holders and (II) Approving Form and Manner of Notifying Creditors of Commencement of Debtors' Chapter 11 Cases and First Meeting of Creditors (Related Doc # 17 )
6/1/2009	161	Order Granting Administrative Expense Status to Undisputed Obligations to Vendors Arising from Postpetition Delivery of Goods and Services Ordered Prepetition and Authorizing Debtors to Pay Such Obligations in Ordinary Course of Business (Related Doc # 27 )
6/1/2009	162	Order Granting Motion of Debtors for Entry of Order Pursuant to 11 U.S.C. Section 105(a) Enforcing Protection of 11 U.S.C. Sections 362, 365(e)(1), and 525 (Related Doc # 23 )
6/1/2009	164	Order Motion of Debtors Authorizing Debtors to (a) Pay Certain Employee Compensation and Benefits and (b) Maintain and Continue Such Benefits and other Employee-Related Programs and (II) Directing Banks to Honor Prepetition Checks for Payment of Prepetition Employee Obligations (Related Doc # 33 )
6/1/2009	169	Order Establishing and Implementing Exclusive and Global Procedures for Treatment of Reclamation Claims (Related Doc # 47 )
6/1/2009	170	Order Authorizing Payment of Certain Prepetition (I) Shipping and Delivery Charges for Goods in Transit, (II) Customs Duties, and (III) Tooling and Mechanics Lien Charges (Related Doc # 53 )
6/1/2009	172	Order Authorizing Debtors to (a) Continue Their Liability, Product, Property, and Other Insurance Programs and (b) Pay All Obligations in Respect Thereof, and (II) Authorizing and Directing Financial Institutions to Honor and Process Checks and Transfers Related to Such Obligations (Related Doc # 72 )
6/1/2009	173	Interim Order Approving Debtors Proposed Form of Adequate Assurance of Payment, (II) Establishing Procedures for Resolving Objections By Utility Companies, and (III) Prohibiting Utilities from Altering, Refusing, or Discontinuing Service (related document(s) 58 )
6/1/2009	174	Order Authorizing Debtors to Pay Prepetition Taxes and Assessments (Related Doc # 55 )
6/1/2009	175	Interim Order signed on 6/1/2009 Authorizing Debtors to (I) Pay Prepetition Claims of Certain Essential Suppliers, Vendors and Services Providers; (II) Continue Troubled Supplier Assistance Program; and (III) Continue Participation in The United States Treasury Auto Supplier Support Program (related document(s) 76 )

<u>Date</u>	<u>Docket Number</u>	<u>Order</u>
6/1/2009	179	Interim Order Authorizing Debtors to (i) Continue Using Existing Cash Management System, (ii) Honor Certain Prepetition Obligations Related to Use of Cash Management System, and (iii) Maintain Existing Bank Accounts and Business Forms; (B) Extending Time to Comply with 11 U.S.C. Section 345(b); and (C) Scheduling a Final Hearing (related document(s) 30)
6/2/2009	292	Interim Order Pursuant to Bankruptcy Code Sections 105(a), 361, 362, 363, 364 and 507 and Bankruptcy Rules 2002, 4001 and 6004 (A) Approving a DIP Credit Facility and Authorizing the Debtors to Obtain Post-Petition Financing Pursuant thereto, (B) Granting Related Liens and Super-Priority Status (C) Authorizing the Use of Cash Collateral, (D) Granting Adequate Protection to Certain Pre-Petition Secured Parties and (E) Scheduling a Final Hearing (Related Docs # 64, 68).
6/25/2009	2529	Final Order (A) Approving A Dip Credit Facility And Authorizing The Debtors To Obtain Post-Petition Financing Pursuant Thereto, (B) Granting Related Liens And Super-Priority Status, (C) Authorizing The Use Of Cash Collateral And (D) Granting Adequate Protection To Certain Pre-Petition Secured Parties (related document(s) 64)
6/25/2009	2533	Final Order Authorizing Debtors To (I) Pay Prepetition Claims Of Certain Essential Suppliers, Vendors, And Service Providers, (II) Continue Troubled Supplier Assistance Program, And (III) Continue Participation In The United States Treasury Auto Supplier Support Program (related document(s) 76)
6/25/2009	2534	Order Authorizing The Debtors To Employ And Retain AP Services, LLC As Crisis Managers And To Designate Albert A. Koch As Chief Restructuring Officer, Nunc Pro Tunc To The Petition Date (Related Doc # 952)
6/25/2009	2542 <sup>1</sup>	Final Order (A) Authorizing The Debtors To (I) Continue Using Existing Cash Management System, (II) Honor Certain Prepetition Obligations Related To The Use Of The Cash Management System, And (III) Maintain Existing Bank Accounts And Business Forms; And (B) Extending Time To Comply With 11 U.S.C. § 345(B) (Related Doc # 30) (the " <b>Cash Management Order</b> ")
6/25/2009	2545	Order Granting Debtor Additional Time To File Reports Of Financial Information Or To Seek Modification Of Reporting Requirements Pursuant To Bankruptcy Rules 2015.3 . (Related Doc # 727).
6/25/2009	2546	Order Authorizing Employment Of Weil, Gotshal & Manges LLP As Attorneys for The Debtors Nunc Pro Tunc To The Commencement Date. (Related Doc # 949)
6/25/2009	2548	Order Authorizing The Employment Of Honigman Miller Schwartz And Cohn LLP As Special Counsel For The Debtors Nunc Pro Tunc To The Petition Date. (Related Doc # 951)
6/25/2009	2549	Order Authorizing Retention And Employment Of The Garden City Group, Inc. As Notice And Claims Agent Nunc Pro Tunc To The Commencement Date. (Related Doc # 953)
7/1/2009	2854	Order Approving Retention Of Kramer Levin Naftalis & Frankel LLP As Counsel To The Official Committee Of Unsecured Creditors Nunc Pro Tunc To June 3, 2009. (Related Doc # 1744).

<sup>1</sup> Exhibit "A" to the Cash Management Order is hereby amended to include the bank accounts of the REALM/ENCORE Debtors which are listed in Exhibit "B" annexed hereto.

<u>Date</u>	<u>Docket Number</u>	<u>Order</u>
7/1/2009	2900	Order Authorizing Debtors To Employ Professionals Utilized In Ordinary Course Of Business. (Related Doc # 1742)
7/5/2009	2969	Order Pursuant to Bankruptcy Code Sections 105(a), 361, 362, 363, 364 AND 507 And Bankruptcy Rules 2002, 4001 AND 6004 (A) Approving Amendment to DIP Credit Facility To Provide Debtors Post-Petition Wind-Down Financing
7/13/2009	3124	Order Granting Application to Employ Butzel Long as Special Counsel Nunc Pro Tunc to June 10, 2009 (Related Doc # 2847)
7/27/2009	3399	Agreed Protective Order Establishing Procedures for the Protection of Confidential Information.
8/3/2009	3625	Order Authorizing the Employment and Retention of Epiq Bankruptcy Solutions, LLC as The Committees Information Agent Nunc Pro Tunc to June 3, 2009 (Related Doc # 3268 )
8/3/2009	3626	Order Granting Motion of The Official Committee of Unsecured Creditors for an Order Establishing Procedures for Compliance with 11 U.S.C. §§ 1102(b)(3) and 1103(c)(Related Doc # 3276)
8/3/2009	3629	Revised Order Establishing Notice and Case Management Procedures.
8/3/2009	3630	Order Authorizing the Retention and Employment of LFR Inc. as Environmental Consultants to the Debtors Nunc Pro Tunc to the Commencement Date (Related Doc # 3279)
8/3/2009	3632	Order Authorizing the Retention and Employment of The Claro Group, LLC as Environmental Consultants to the Debtors Nunc Pro Tunc to the Commencement Date (Related Doc # 3281)
8/3/2009	3633	Order Authorizing Debtors to Employ and Retain Jones Day as Special Counsel For the Debtors, Nunc Pro Tunc to the Petition Date (Related Doc # 3282)
8/3/2009	3634	Order Authorizing Retention and Employment of Baker & McKenzie as Special Counsel, Nunc Pro Tunc to the Commencement Date (Related Doc # 3283)
8/3/2009	3638	Order Authorizing the Retention and Employment of Brownfield Partners, LLC as Environmental Consultants to the Debtors Nunc Pro Tunc to the Commencement Date (Related Doc # 3280)
8/7/2009	3711	Order Granting Motion of Debtors for Entry of Order Pursuant to 11 U.S.C. §§ 105(a) and 331 Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals (Related Doc # 3278)
8/18/2009	3829	Order Authorizing the Retention and Employment of FTI Consulting, Inc., as its Financial Advisor, Nunc Pro Tunc to June 3, 2009 (Related Doc # 3659)
8/18/2009	3830	Order Granting Motion Pursuant to 11 U.S.C. §§ 105 and 363 (A) Establishing Procedures for the Disposition of De Minimis Assets, and (B) Authorizing the Debtors to (I) Pay Related Fees, and (II) Assume, Assume and Assign, or Reject Related Executory Contracts or Unexpired Leases(Related Doc # 3478)
8/18/2009	3831	Order Granting Motion Pursuant to 11 U.S.C. § 363 Authorizing the Debtors to Amend the Terms of Their Engagement Letter With AP Services, LLC (Related Doc # 3686)
8/18/2009	3832	Order Granting Additional Time to File Reports of Financial Information or to Seek Modification of Reporting Requirements Pursuant to Bankruptcy Rule 2015.3 (Related Doc # 3662)
8/20/2009	3860	Order Granting Motion to Enlarging the Time Within Which to File Notices of Removal of Related Proceedings (Related Doc # 3674)

<u>Date</u>	<u>Docket Number</u>	<u>Order</u>
9/15/2009	4048	Recusal Order Re: Candace Arthur Volunteer Law Clerk
9/15/2009	4052	Order Authorizing the Debtors to Amend the Terms of Their Engagement with Brownfield Partners, LLC. (Related Doc # 3938)
9/29/2009	4126	Order Pursuant to 11 U.S.C. §§ 363 and 105(a) for Authority to Reimburse Former Directors of General Motors Corporation (related Doc # 4058)
10/6/2009	4180	Order Authorizing the Debtors to (I) File Omnibus Claims Objections and (II) Establish Procedures for Settling Certain Claims (Related Doc # 4108)

**Exhibit B**

**Bank Accounts of REALM/ENCORE Debtors**

**Environmental Corporate Remediation Company, Inc.  
Domestic Bank Accounts**

	<b>Account Type</b>	<b>Account Name</b>	<b>Account Number (Last Four Digits)</b>
Citibank, N.A. 1 Penn's Way New Castle, DE 19720	DEP	Citibank, N.A.	6071

**Remediation And Liability Management Company, Inc.  
Domestic Bank Accounts**

	<b>Account Type</b>	<b>Account Name</b>	<b>Account Number (Last Four Digits)</b>
Citibank, N.A. 1 Penn's Way New Castle, DE 19720	DEP	Citibank, N.A.	0578
JPMorgan Chase 270 Park Ave. #12 New York,NY,10017-7924	DEP	JPMorgan Chase	2083
JPMorgan Chase 270 Park Ave. #12 New York,NY,10017-7924	DEP	JPMorgan Chase	9624
JPMorgan Chase 270 Park Ave. #12 New York,NY,10017-7924	DEP	JPMorgan Chase	9474